

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-20940-CIV-ALTONAGA/Reid**

NIGEL FRANK DE LA TORRE PARDO,

Plaintiff,

v.

PENNEY OPCO LLC; *et al.*

Defendants.

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**DEFENDANT PENNEY OPCO LLC'S CERTIFICATE OF INTERESTED PARTIES  
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and the Court's Order issued on March 14, 2024 (Dkt. No. 6), Defendant, PENNEY OPCO LLC ("Defendant"), makes the following disclosures:

1. The name of each person, attorney, association of persons, firm, law firm, partnership, and corporation that has or may have an interest in a party to this action or in the outcome of this action, including subsidiaries, conglomerates, affiliates, parent corporations, publicly-traded companies that own 10% or more of a party's stock, and all other identifiable legal entities related to a party:

Penney Opc LLC

Simon JCP Holdings, LLC

BPG Retail Holdings I, LLC

ABG Holdings, LLC

Penney Management Holdings LLC

Copper Retail JV, LLC

Penney Holdings, LLC

Penney Intermediate Holdings, LLC

Penney Borrower, LLC

Adams and Reese LLP

Benjamin W. Bard, Esq.

Nigel Frank De La Torre Pardo

Aventura Mall Venture

Garcia-Menocal, P.L.

Armando Mejias, Esq.

Beverly Virues, Esq.

Law Office of Ramon J. Diego, P.A.

Ramon Julio Diego, Esq.

Pablo Baez, AccessAble

2. The name of every other entity whose publicly-traded stock, equity, or debt may be substantially affected by the outcome of the proceedings:

None.

3. The name of every other entity which is likely to be an active participant in the proceedings, including the debtor and members of the creditors' committee (or if no creditors' committee the 20 largest unsecured creditors):

None.

4. The name of each victim (individual and corporate), including every person who may be entitled to restitution:

Defendant is not aware of any person, other than the parties, arguably entitled to restitution, though Defendant expressly denies any wrongdoing and denies that Plaintiff has any such entitlement.

5. Undersigned counsel certifies that he is unaware of any actual or potential conflict of interest involving the District Judge and Magistrate Judge assigned to this case and will immediately notify the Court in writing upon learning of any such conflict.

Respectfully submitted,

/s/ Benjamin W. Bard

Benjamin W. Bard

Florida Bar No. 95514

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*Attorney for Defendant*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 15, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will automatically serve a copy to all counsel of record.

/s/ Benjamin W. Bard